

REMARKS

In the Office Action, claims 1-4 were rejected under 35 U.S.C. § 102(e) as allegedly anticipated by U.S. Patent No. 6,578,015 to Haseltine et al. ("Haseltine"). Applicants respectfully traverse all rejections of record.

Status of the claims

Claims 1-4 are pending.

Claims 1-4 are rejected under 35 U.S.C. § 102.

Rejections under 35 U.S.C. § 102(e)

Claims 1-4 were rejected under 35 U.S.C. § 102(e) as allegedly anticipated by Haseltine

Claim 1 recites, *inter alia*:

providing a plurality of biller service providers to interface with one or more of said billers and to collect said billing information from said billers with respect to one or more of said customers;

providing a centrally located switching system coupled to said bill payment and presentment system for coordinating the routing of messages between said customer service providers and biller service providers;

generating at said customer service providers and biller service provider mainframe application files comprising said messages;

forwarding said mainframe application files in batch mode to said centrally located mainframe system; and

converting at said switching system said mainframe application files into Internet accessible addresses for delivery of said messages over the Internet to one or more intended recipients comprising at least one of said customer service providers or said biller service providers.

The Examiner alleges that Haseltine discloses or suggests these claim limitations. (*See* Office Action, page 2-3). Applicants respectfully disagree.

Claim 1 recites, “generating at said customer service providers and biller service provider mainframe application files comprising said messages” and “forwarding said mainframe application files in batch mode to said centrally located mainframe system.” Haseltine does not disclose or suggest these features of claim 1.

Haseltine describes, “[a] plurality of customers may be registered simultaneously into the bill presentment and payment database in a batch mode by loading XML or OFX-formatted customer data into the first area via Hypertext Transfer Protocol (http) or by file transfer, via File Transfer Protocol (ftp).” (Haseltine, col. 3, lines 53-58) Although Haseltine describes the use of a batch mode, it does not describe forwarding mainframe application files comprising messages between biller service providers and customer service providers as recited in claim 1. Instead, a batch mode is used for registering customers by loading formatted customer data into a database as described above. As described in the specification regarding current systems, “[t]he present systems are still flawed due to their inability to utilize all information available and *in particular mainframe application files in batch mode.*” (Specification, paragraph 0010) Loading *customer data* into a *database* is not the same as “forwarding said *mainframe application files* in batch mode to said *centrally located mainframe system.*” as recited in claim 1.

Claim 1 further recites, “converting at said switching system said mainframe application files into Internet accessible addresses for delivery of said messages over the Internet to one or more intended recipients comprising at least one of said customer service providers or said biller service providers.” Haseltine does not disclose or suggest this feature of claim 1. Instead, Haseltine describes, “billers...have the option of transmitting bill data **402** and/or bill format data **404** to the electronic presentment and payment database **400**...The bill data stream **402** may be coded according to any number of formats such as, for example, the Open Financial Exchange

(OFX) format...The bill format data **404** may include HTML-formatted data configured to mimic the ‘look-and feel’ of the biller’s traditional paper bills.” (Haseltine, col. 4 line 53 - col. 5 line 16) Entering HTML-formatted data into the *database* is not the same as converting application files in Internet accessible addresses at a *switching system* as recited in claim 1. Furthermore, “HTML-formatted data” is not the same as the claimed “Internet accessible addresses.”

In fact, Haseltine does not describe a switching system as recited in claim 1 at all. Claim 1 recites, “providing a centrally located switching system coupled to said bill payment and presentment system for coordinating the routing of messages between said customer service providers and biller service providers. In the system of Haseltine, however, “[o]nce the bill data **402** and/or the bill format data **404** loaded into the staging area **420** has been validated, it may be swapped into a portion of the active area **430** of the database **400** through a workflow process that swaps database partitions...According to an embodiment of the present invention, the partitioning process may be carried out according to the parameters set out, for example, in chapter 8 of *Oracle 8 Server Concepts*.” (Haseltine, col. 5 line 54- col. 6 line 2, emphasis in original) Swapping database information through a workflow process as described in Haseltine is not the same as “providing a centrally located switching system...for coordinating the routing of messages” as recited in claim 1. A database as described in Haseltine is not the same as a centrally located switching system, and nowhere does Haseltine disclose or suggest coordinating the routing of messages as recited in claim 1.

Accordingly, because Haseltine fails to disclose or suggest several limitations of claim 1, Applicants respectfully submit that independent claim 1 should be allowed. Claims 2-3 depend from claim 1 and should be allowed for at least these same reasons.

Claim 4 recites, *inter alia*:

converting at said switching system said mainframe application files into Internet accessible addresses for delivery of said messages to said intended recipients over said public lines.

These features of claim 4 are similar to features of claim 1 as discussed above.

Therefore, claim 4 should be allowed for at least the same reasons discussed above with respect to claim 1.

CONCLUSION

In view of the foregoing remarks, favorable consideration and allowance of claims 1-4, all pending claims, are respectfully solicited. Applicants hereby authorize the Commissioner to charge payment of any additional fees or credit any overpayment associated with this communication to Deposit Account No. 02-4377. In the event that the application is not deemed in condition for allowance, the Examiner is invited to contact the undersigned in an effort to advance the prosecution of this application.

Respectfully submitted,



Robert C. Scheinfeld
Patent Office Reg. No. 31,300
(212) 408-2512

Robert L. Maier
Patent Office Reg. No. 54,291
(212) 408-2538

Attorneys for Applicants

BAKER BOTTS, L.L.P.
30 Rockefeller Plaza
New York, New York 10112-4498